

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO,  
et. al.

Defendants.

CIVIL NO. 12-2039 (GAG)(PG)

EXTENSION OF TIME TO FILE RESPONSE TO TCA'S REPORT

TO THE HONORABLE COURT:

**COME NOW** the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau, through the undersigned counsel, and respectfully allege and pray as follows:

1. On June 6, 2018, the Technical Compliance Advisor filed his *7<sup>th</sup> Six Month Report and Tables* in restricted mode. (See Docket 871).
2. Pursuant to Paragraph 252 of the Agreement, PRPB and USDOJ have 30 days to file a response to the TCA's final report. (See Docket 60, ¶252).
3. However, the PRPB is still in the process of analyzing the TCA's Report at Docket No. 871 and needs additional time to submit its response.
4. Moreover, on July 2, 2018, this Honorable Court ordered the Commonwealth to show cause, on or before July 10, as to why Docket No. 871 (*7<sup>th</sup> Six Month Report and Tables*) should not be unrestricted. (See Docket 902).
5. Considering that the Order of the Court at Docket No. 902 is linked with the response to the TCA's Report, the Commonwealth posits that it would be

adequate to file the response after the Commonwealth has presented the Court ordered motion at Docket 902.

6. Consequently, the Commonwealth requests an extension of time for the PRPB to submit its response to the TCA's Report before July 13, 2018.

**WHEREFORE**, it is respectfully requested from this Honorable Court to take notice of the above stated and grant this instant motion for an extension of time.

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on July 6, 2018.

**WANDA VÁZQUEZ GARCED**  
Secretary of Justice

**WANDYMAR BURGOS VARGAS**  
Deputy Secretary in Charge of  
Litigation  
Department of Justice

**SUSANA PEÑAGARÍCANO BROWN**  
Director of Federal Litigation  
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